

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Thomas Vanaskie  
(Ret.)  
Special Discovery Master

**TEVA’S MOTION TO REDACT AND SEAL PORTIONS OF THE  
HEARING TRANSCRIPT OF SEPTEMBER 13, 2021  
PURSUANT TO LOCAL CIVIL RULE 5.3(g)**

Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Activas LLC, and Actavis Pharma, Inc. (collectively “Teva”), by and through their counsel, respectfully move, pursuant to Local Civil Rule 5.3(g), to redact and seal portions of the transcript of the hearing before Special Discovery Master Judge Vanaskie dated September 13, 2021 (the “Sept. 13 Transcript”) on Teva’s letter brief in support of challenged confidentiality designations. In support of this motion, Teva relies upon the Declaration of Brian H. Rubenstein (“Rubenstein Declaration”). A proposed form of Order, including Proposed Findings of Fact and Conclusions of Law pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because the relevant proposed findings of fact and conclusions of law required by Local Civil

Rule 5.3(c)(2) are contained in the Proposed Order and supported by the Rubenstein Declaration, which describe with particularity: (a) the nature of the portions of the Sept. 13 Transcript to be redacted and sealed; (b) the legitimate private interest which warrants redacting and sealing portions of the Sept. 13 Transcript; (c) the clearly defined and serious injury that would result if portions of the Sept. 13 Transcript were not redacted and sealed as proposed; (d) why less restrictive alternatives to redacting and sealing portions of the Sept. 13 Transcript are not available; (e) any prior Order sealing the Sept. 13 Transcript; (f) the identity of any party or nonparty known to be objecting to the sealing request; (g) the materials to which there is an objection; (h) the basis for the objection; and (i) whether the material or information sought to be redacted was previously sealed by the Court in the pending action, and (j) why the materials should be maintained under seal.

Dated: October 15, 2021

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

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Industries Ltd., Actavis LLC, and  
Actavis Pharma, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 15, 2021, the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

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